

FILED
IN OPEN COURT

APR 11 2012

CLERK, U.S. DISTRICT COURT
NEWPORT NEWS, VA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Newport News Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 4:12cr <u>39</u>
)	
v.)	18 U.S.C. § 1951(a)
)	Conspiracy to Obstruct, Delay, and
ALEXANDER CUADROS-GARCIA)	Affect Commerce by Robbery
a/k/a "Alex" "Brujo" "Aleto" "Manuel Gonzalez")	(Count 1)
(Counts 1-3))	
)	18 U.S.C. §§ 1951(h) and 2
LUCESITA ARGUETA)	Conspiracy to Launder Money
a/k/a "Lucy")	(Count 2)
(Counts 1-3))	
)	18 U.S.C. §1952(a)(3)
RAUL ANTONIO ESCOBAR-MARTINEZ)	Interstate Travel In Aid of
a/k/a "Tony")	Racketeering
(Counts 1 and 2))	(Count 3)
)	
FRANCISCO MONTESREIN-RODRIGUEZ)	
a/k/a "Lois K" "Lex" and "Luis Rodriguez")	
(Counts 1-3))	
)	
LEONARDO ORTIZ)	
a/k/a "Luis Angel Arana-Garcia")	
(Counts 1-3))	
)	
JOSE ALFREDO RIVERO-GARCIA)	
a/k/a "Alfredo" and "Jose Ribero")	
(Counts 1-3))	
)	
WILLIAM LEANDRO HERRERA-BOHORQUEZ)	
a/k/a "Freddy Maldonado-Cepeda")	
(Counts 1 and 2))	
)	
JUANITA DIAZ)	
(Count 2))	

INDICTMENT

April 2012 Term - At Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

Beginning in or about 2010 and continuing through in or about March 2012, in the Eastern District of Virginia, and elsewhere, the defendants, **ALEXANDER CUADROS-GARCIA**, a/k/a “Alex,” “Brujo,” “Aleto,” and “Manuel Gonzalez”, **LUCESITA ARGUETA**, a/k/a “Lucy”, **RAUL ANTONIO ESCOBAR-MARTINEZ**, a/k/a “Tony” , **FRANCISCO JAVIER MONTESREIN-RODRIGUEZ**, a/k/a “Lois K,” “Lex,” and “Luis Rodriguez;” **LEONARDO ORTIZ**, a/k/a “Luis Angel Arana-Garcia”; **JOSE ALFREDO RIVERO-GARCIA**, a/k/a “Alfredo” and “Jose Ribero” , and **WILLIAM LEANDRO HERRERA-BOHORQUEZ**, a/k/a “Freddy Maldonado-Cepeda”, did knowingly and willfully combine, conspire, confederate and agree with each other to unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants did unlawfully agree to take and obtain United States currency, jewelry and jewels from jewel couriers, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons, property in their custody and possession, that is, the defendants used, carried, displayed, possessed, brandished, and pointed firearms and knives at said jewel couriers, and demanded United States currency, jewelry and jewels in violation of Title 18, United States Code, Section 1951.

Manner and Means of the Conspiracy

It was part of the conspiracy that the defendants would and did:

1. Conduct surveillance of jewelry stores;
2. Identify jewel couriers who were visiting jewelry stores in New York, California, Maryland, North Carolina, Tennessee, New Jersey, Pennsylvania and Virginia in a business capacity;
3. Follow the jewel couriers from the jewelry store to other locations;
4. Use cellular telephones to conduct the surveillance of the jewelry stores and the jewel couriers
5. Block in the vehicles of jewel couriers thereby preventing their escape;
6. Assault the jewel couriers and steal United States currency, jewelry and jewels from the jewel couriers;
7. Travel to New York and sell the stolen jewels and jewelry to fences;
8. Split the illegal proceeds of the stolen jewels and jewelry.

Overt Acts

In furtherance of the conspiracy and in order to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of Virginia and elsewhere:

1. Register a Black 2004 Mazda with Virginia license plates XEM-4693 to a fictitious address.
2. On or about June 1 and 2, 2011, did conduct surveillance on a jewel courier in Williamsburg, Virginia.
3. Withdrew cash from bank accounts in Virginia on or about June 15, 2011.
4. In 2011 and 2012 used multiple and changing cellular telephones while conducting surveillance of jewel couriers.

5. On or about October 5 and 6, 2011 conducted surveillance of a federal law enforcement agent posing as a jewel courier.
6. On or about January 26 and 27, 2012, followed a jewel courier from Richmond, Virginia to Raleigh, North Carolina.
7. Traveled to San Francisco, California to conduct surveillance of jewel couriers on or about February 2012.
8. Traveled to Nashville, Tennessee to conduct surveillance of jewel couriers on or about February 28, 2012.
9. Traveled to New York in 2011 and 2012 to “fence” jewels and jewelry.
10. In March 2012 traveled to Maryland to conduct surveillance of jewel couriers.

(All in violation of Title 18, United States Code, Section 1951(a)).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Beginning at in or about 2010, the exact date being unknown to the Grand Jury, up until the date of this indictment, in the Eastern District of Virginia and elsewhere, **ALEXANDER CUADROS-GARCIA**, a/k/a “Alex,” “Brujo,” “Aleto,” and “Manuel Gonzalez”, **LUCESITA ARGUETA**, a/k/a “Lucy”, **JUANITA DIAZ**, **RAUL ANTONIO ESCOBAR-MARTINEZ**, a/k/a “Tony”, **FRANCISCO JAVIER MONTESREIN-RODRIGUEZ**, a/k/a “Lois K,” “Lex,” and “Luis Rodriguez,” **LEONARDO ORTIZ**, a/k/a “Luis Angel Arana-Garcia”; **JOSE ALFREDO RIVERO-GARCIA**, a/k/a “Alfredo” and “Jose Ribero”, and **WILLIAM LEANDRO HERRERA-BOHORQUEZ**, a/k/a “Freddy Maldonado-Cepeda”, the defendants herein, did knowingly, willfully, and unlawfully combine conspire, confederate and agree with each other and other persons, both known and unknown, to knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, including the purchase, lease, financing, transfer and sale of personal and investment properties, including telephones and cellular telephones, rental vehicles, vehicles, residences, rental properties, travel expenses, and the shipment and transportation of stolen items and the remittance of monies derived from their conspiracy to obstruct, delay and affect, commerce by robbery within the Eastern District of Virginia and elsewhere, which involved the proceeds of a specified unlawful activity, that is, conspiracy to obstruct, delay and affect, commerce by robbery, in violation of Title 18, United States Code, Section 1951(a), by the defendants named in this Indictment, and that, while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity and knowing that the financial transactions were designed in whole and in part to conceal or disguise the nature, the location, the source, the ownership, and control of the proceeds of the said specified unlawful activity.

(All in violation of Title 18, United States Code, Section 1956(h)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about or between March 19, 2012 and March 20, 2012, **ALEXANDER CUADROS-GARCIA, LUCESITA ARGUETA, FRANCISCO JAVIER MONTESREIN-RODRIGUEZ, LEONARDO ORTIZ and JOSE ALFREDO RIVERO-GARCIA**, the defendants herein, did knowingly and intentionally travel in interstate commerce from Richmond, Virginia to Maryland with the intent to promote, carry on, and facilitate the carrying on of an unlawful activity, namely being a business enterprise involving the robbery of jewel couriers and the conspiracy to rob jewel couriers, in violation of Title 18, United States Code, Section 1951(a), and thereafter the defendants did perform and attempt to perform acts to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activity, namely on or about March 19, 2012, **ALEXANDER CUADROS-GARCIA, LUCESITA ARGUETA, FRANCISCO JAVIER MONTESREIN-RODRIGUEZ, LEONARDO ORTIZ and JOSE ALFREDO RIVERO-GARCIA** conducted a financial transaction, to wit: renting hotel rooms to facilitate the robbery of jewel couriers and the conspiracy to rob jewel couriers.

(All in violation of Title 18, United States Code, Sections 1952(a)(3) and 2).

UNITED STATES V. ALEXANDER CUADROS-GARCIA, ET. AL., 4:12CR 39

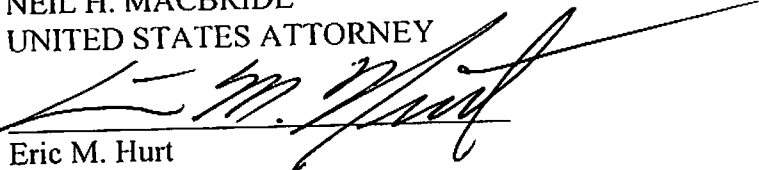
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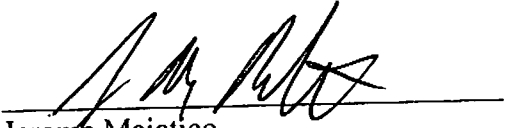
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